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*Attorneys for Defendants*

10 **UNITED STATES DISTRICT COURT**

11 **DISTRICT OF NEVADA**

12 SARA KIM NGUYEN, individually,

13 Plaintiff,

14 vs.

15 LANE F. SMITH, M.D., individually; SMITH  
16 SALON, LLC dba Chic La Vie, a Limited-  
Liability Company; SMITH PLASTIC  
17 SURGERY INSTITUTE, PC, a Professional  
Corporation; SMITH PLASTIC SURGERY  
18 BUILDING LLC, a Limited-Liability Company;  
ROE ENTITIES I – V, inclusive,

19 Defendants.  
20

Case No.: 2:21-cv-00213-KJD-BNW

**STIPULATION AND PROPOSED  
ORDER TO EXTEND TIME FOR  
PLAINTIFF TO RESPOND TO  
DEFENDANT’S PENDING MOTIONS  
TO SEAL OR STRIKE  
AND  
TO EXTEND TIME FOR  
CORPORATE DEFENDANTS TO  
RESPOND TO THE COMPLAINT  
(First Request)**

21 Defendant Lane F. Smith, M.D. (hereinafter “Dr. Smith”) by and through his counsel,  
22 Amanda L. Ireland, Esq. and Gabriel L. Grasso, Esq., and Plaintiff, Sarah Kim Nguyen,  
23 (hereinafter “Plaintiff”) by and through her counsel of record Andre M. Lagomarsino, Esq. and  
24 Cory M. Ford, Esq., do hereby stipulate and agree to an 11-day extension of time for Plaintiff to

1 respond to Defendant's Motion to Seal Complaint, or, in the Alternative, Motion to Strike  
2 Scandalous Immaterial Matter (Doc. #9)("Motion to Seal or Strike") from March 12, 2021 until  
3 March 22, 2021. The Complaint was filed on February 9, 2021, and the Motion to Seal or Strike  
4 was filed on February 26, 2021.

5 The parties further stipulate and agree to extend the time for the corporate defendants  
6 (Smith Salon, LLC, Smith Plastic Surgery Institute, PC, and Smith Plastic Surgery Building,  
7 LLC) to appear and respond to the Plaintiff's Complaint (Doc. #1) from March 15, 2021 until 14  
8 days after notice of the Court's action on the Motion to Seal or Strike.

9 These requests are submitted pursuant to Local Rules IA 6-1, 6-2 and II 7-1 and the  
10 Federal Rules of Civil Procedure 12(a)(4), and 12(f), and are the parties' first requests for an  
11 extension of pending deadlines.

12 These extensions are requested due to agreements between counsel for the parties, and for  
13 good cause. Counsel for Dr. Smith sought an extension for the corporate defendants to respond  
14 to the Complaint in the interests of litigation efficiency and avoiding needless duplication of  
15 responsive pleadings in light of Dr. Smith's FRCP 12(b) Motion to Seal or Strike.

16 Meanwhile, counsel for the Plaintiff requested an extension to respond to the Motion to  
17 Seal or Strike due to an attorney leaving his law office to start his own practice.

18 Accordingly, Plaintiff shall have up to and including March 22, 2021 to respond to  
19 Defendant's Motion to Seal or Strike, and the corporate defendants (Smith Salon, LLC, Smith  
20 Plastic Surgery Institute, PC, and Smith Plastic Surgery Building, LLC) shall have until 14 days  
21 after notice of the Court's action on the Motion to Seal or Strike.  
22  
23  
24

1 Dated this 11<sup>th</sup> day of March 2021.

2 IRELAND LAW GROUP, LLC

3 /s/ Amanda L. Ireland

4 By: \_\_\_\_\_

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16 *Attorneys for Defendants*

Dated this 11<sup>th</sup> day of March 2021.

LAGOMARSINO LAW

/s/ Andre M. Lagomarsino

By: \_\_\_\_\_

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*Attorneys for Plaintiff*

16 **IT IS SO ORDERED:**

17 

18 **UNITED STATES DISTRICT JUDGE**

19 **Dated: March 15, 2021**